

August 28, 2018

US EPA Region 8
Air and Radiation Program, 8P-AR
1595 Wynkoop Street
Denver, CO 80202-1129

Re: 40 CFR 60, Subpart OOOOa Semi-Annual Report
Ironhorse Complex Gas Plant -- Ironhorse II Process Train
Unitah County, Utah

Dear Sir or Madam:

Andeavor, operator of the Ironhorse Complex Gas Plant, is submitting the 40 CFR 60, Subpart OOOOa Semi-Annual report on behalf of QEP Field Services, LLC.

As required by 40 CFR §60.636, §60.5420, and §60.5420a, Andeavor is providing the attached Subpart OOOOa semi-annual report for the Ironhorse II process train. This report covers the time period of February 1, 2018 through July 31, 2018.

The pump list checklist used to conduct weekly pump inspections according to 40 CFR 60.482-2a(a)(2) was found to be inaccurate. Reviews indicated that two pumps were not included in weekly inspections; the missing pumps were included on the checklist in April 2018.

During the reporting period, there were a total of ten connectors located in the Ironhorse II process unit that were added to the LDAR inventory which were not previously identified or monitored as required by 60.482-11a. These components have been tagged and added to the monitoring program.

The facility had no planned shutdowns between February 1, 2018 and July 31, 2018. As of July 31, 2018, four NSPS OOOO components were designated as on delay of repair. A list of active delay of repair components is attached.

If you have any questions concerning this report, please contact me by phone at (303) 454-6676 or by email at Heather.L.Vainisi@andeavor.com.

Andeavor
1801 California Street
Denver, CO 80202



Sincerely,

A handwritten signature in dark ink, appearing to read "Heather Vainisi". The signature is fluid and cursive, with the first name "Heather" being more prominent than the last name "Vainisi".

Heather Vainisi
Supervisor - Environmental

Enclosures: Ironhorse II Delay of Repair List